

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Albert Russo PO Box 4853 Trenton, NJ 08650 (609) 587-6888 Standing Chapter 13 Trustee	
In re: Nakia C Shepperson <div style="text-align: right;">Debtor(s)</div>	Case No.: 20-16607 / CMG Chapter 13 Hearing Date: 11/02/2022 at 10:00 AM Judge: Christine M. Gravelle

TRUSTEE'S OBJECTION TO MODIFIED PLAN

Albert Russo, the Standing Chapter 13 Trustee, hereby objects to the Modified Plan filed by the debtor for the following reasons:

1. The Modified Plan filed by the debtor is not filed in good faith pursuant to Section 1325(a)(3).
 - The modified plan proposes to reduce payment and base from 100% to a pro rata base.
 - There is no basis to reduce Trustee payment. Disposable income verifies at \$1324.46 and will increase to 2063 when 401k loan expires on 8/14/23.
 - Plan fails to include minimum dividend of \$22,456 per previous plan due to n/e equity in real estate and personal property
 - Trustee also objects to amended J for excessive expenses of \$500 for electric; \$250 for water and \$626 auto payment which were previously objected to in original plan.
 - The debtor's arrears are \$6888.
 - Need copy of 2021 Tax Return.

Dated: October 27, 2022

/s/ Albert Russo

Albert Russo, Standing Chapter 13 Trustee

By: Erik Collazo, Staff Attorney